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*Attorneys for Defendants HP Enterprise Services,
LLC, HP Enterprise Services UK Ltd, and Hewlett-
Packard (Canada) Co*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
DELPHI CORPORATION, et al.,	:	Case No. 05-44481 (RDD)
		Jointly Administered

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DELPHI CORPORATION, et al.,	:	
Plaintiffs,	:	Adv. Pro. No. 07- 02262 (RDD)
v.	:	
EDS, EDS CORP., ELECTRONIC DATA SYSTEMS, ELECTRONIC DATA SYSTEMS CORP., ELECTRONIC DATA SYSTEMS DE, ELECTRONIC DATA SYSTEMS LTD. and EDS CANADA INC.,	:	
Defendants.	:	

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**NOTICE OF HEARING ON MOTION OF HP ENTERPRISE
SERVICES, LLC AND AFFILIATES FOR AN ORDER DISMISSING
THE COMPLAINT WITH PREJUDICE, AND VACATING CERTAIN
PRIOR ORDERS PURSUANT TO FED. R. CIV. P. 60 AND FED. R. BANKR. P. 9024**

PLEASE TAKE NOTICE that a hearing on the annexed motion (“Motion”) of HP Enterprise Services, LLC, formerly known as Electronic Data Systems Corporation (“HPES”), HP Enterprise Services UK Ltd, formerly known as Electronic Data Systems Ltd. and EDS Canada, Inc., now Hewlett-Packard (Canada) Co. by operation of merger, (together, the “EDS Defendants” or “Movant”) for an order of this Court: (i) dismissing, with prejudice, the Complaint, pursuant to Fed. R. Civ. P. 12(b) and Fed. R. Bankr. P. 7012(b) on the ground that it is both barred by the two-year statute of limitations imposed by 11 U.S.C. § 546(a) and fails to adequately plead a claim showing that the Plaintiffs are entitled to relief under Fed. R. Civ. P. 8(a) and Fed. R. Bankr. P. 7008 and therefore fails to state a claim upon which relief may be granted or, in the alternative, dismissing, with prejudice, the Complaint on the grounds that it is barred by laches, judicial estoppel and res judicata; (ii) dismissing the Complaint as against HP Enterprise Services UK Ltd and Hewlett-Packard (Canada) Co., pursuant to Fed. R. Civ. P. 12(b) and Fed. R. Bankr. P. 7012(b) for lack of personal jurisdiction over the foreign defendants; and (iii) to the extent necessary to afford complete relief, vacating, with respect to the EDS Defendants, pursuant to Fed. R. Civ. P. 60 and Fed. R. Bankr. P. 9024, certain the orders of this Court, including the Preservation of Estate Claims Procedures Order (as defined in the Motion) dated August 16, 2007, the Extension Orders (as defined in the Motion) dated March 28, 2008, April 30, 2008 and October 22, 2009 respectively, and the Modified Plan Confirmation Order (as defined in the Motion) dated July 30, 2009, on the grounds that such orders are void against the EDS Defendants because the Extension Orders were improvidently made, as more fully described in the Motion, will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, of the United States Bankruptcy Court for the Southern District of New York,

300 Quarropas Street, White Plains, New York 10601-4140 (the “Bankruptcy Court”), on May 17, 2010 at 10:00 a.m (ET) (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that objections to the Motion, if any, must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and Local Rules of the Bankruptcy Court and shall be filed with the Bankruptcy Court electronically by registered users of the Bankruptcy Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Bankruptcy Court) and, by all other parties in interest, on a CD-ROM, preferably in Portable Document Format (PDF), Word or any other Windows-based word processing format, in either case, with a courtesy copy delivered directly to the Chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601-4140; and shall be served upon: (i) counsel to the EDS Defendants, Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, New York 10006 (Attn: Lisa M. Schweitzer, Esq.); (ii) the Debtors, DPH Holdings Corp., et al., 5725 Delphi Drive, Troy, MI 48098; (iii) counsel to the Debtors, Butzel Long, A Professional Corporation, 380 Madison Avenue, 22nd Floor, New York, NY 10017 (Attn: Eric B. Fisher, Esq.) and Butzel Long, A Professional Corporation, 150 West Jefferson, Suite 100, Detroit, MI 48226, Attn: Cynthia J. Haffey, Esq.; and (iv) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004; so as to be received no later than **April 26, 2010 at 5:00 p.m.** (ET) (the “Objection Deadline”).

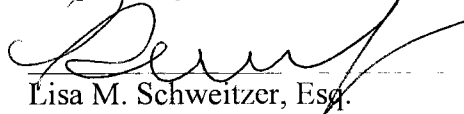
PLEASE TAKE FURTHER NOTICE that only those objections that have been filed and served by the Objection Deadline in accordance with the procedures herein may be considered by the Bankruptcy Court at the Hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court may grant the relief requested in the Motion without a hearing if no objections to the Motion are timely filed and served.

Dated: New York, New York
April 9, 2010

Respectfully submitted,



Lisa M. Schweitzer, Esq.

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HP Enterprise Services UK Ltd, formerly known as
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Hewlett-Packard (Canada) Co by operation of merger,*